

No. PD-0005-18

IN THE
COURT OF CRIMINAL APPEALS
FOR THE STATE OF TEXAS

FILED
COURT OF CRIMINAL APPEALS
8/22/2018
DEANA WILLIAMSON, CLERK

**MARGARET FAYE
LITCHFIELD**

Appellant

v.

STATE OF TEXAS

Appellee

Appeal from the 52nd Judicial District Court of Coryell County, Texas
Trial Court Number 15-22720
Cause Number 06-17-00007-CR in the Sixth Court of Appeals of Texas

**STATE'S FIRST MOTION FOR EXTENSION OF TIME
TO FILE BRIEF**

**52ND JUDICIAL DISTRICT ATTORNEY
FOR CORYELL COUNTY, TEXAS**

Charles Karakashian, Jr.

Special Prosecutor

P. O. Box 929

Gatesville, Texas 76528

Phone: (254) 865-5911 Fax: (254) 865-5147

E-Mail: ckarakashian@aol.com

State Bar No. 11095700

August 21, 2018

STATE'S FIRST MOTION FOR EXTENSION OF TIME TO FILE BRIEF

TO THE HONORABLE COURT OF CRIMINAL APPEALS:

Comes now, the State of Texas, by and through her Special Prosecutor for the 52nd Judicial District, and requests that this Honorable Court extend the time to file a brief for the State for thirty (30) days, pursuant to Tex. R. App. P. 10.5 and in support hereof would show the Court as follows:

I

The State's brief is currently due on August 22, 2018. Appellant's brief was filed on July 23, 2018.

II

I was appointed as a special prosecutor on a part time basis to handle the appellate duties in this office. I was also appointed special prosecutor to represent the State of Texas and handle appeals for the 21st Judicial District Attorney's Office. I am also an adjunct professor of criminal justice and I am currently teaching fall classes at Hill College and Central Texas College. I also completed a course of instruction teaching Juvenile Justice at the McLennan Community College Police Academy.

I am diligently working on the State's brief in *Davis v. State*, No. 10-17-

00396-CR, which is due in the Tenth Court of Appeals. This is a non-death penalty capital murder case. I recently completed and filed the State's brief in *Hogan v. State*, No. 07-18-00189 CR, in the Seventh Court of Appeals on July 30, 2018. I have also just returned from a week long summer family vacation.

Additionally, I prepare responses to writs and motions for new trial that are filed with this office.

II

The State seeks a thirty (30) day extension of time in which to file its brief.

III

The undersigned special prosecutor has been able to obtain the record, but has not had time to adequately research the issues involved and file a brief. This appeal is from a two week old trial of a seventeen year old murder case. It involves the testimony of thirty-three witnesses.

The additional time requested is not sought for delay but will be of genuine assistance to the State in preparing its brief.

The State has not requested a previous extension in this matter.

PRAYER

WHEREFORE, PREMISES CONSIDERED, the State of Texas respectfully requests that the deadline to file the brief be extended thirty (30) days to September

21, 2018.

Respectfully submitted,

/s/ Charles Karakashian, Jr.

Charles Karakashian Jr.

Special Prosecutor,

52nd Judicial District Attorney's Office

P. O. Box 929

Gatesville, TX 76528

254-865-5911, ext 2267

254-865-5147 (fax)

State Bar No. 11095700

E-mail: ckarakashian@aol.com

Certificate of Service

I, Charles Karakashian Jr., hereby certify by my signature below that on August 21, 2018, the foregoing Motion for Extension of Time to File Brief was e-mailed to Counsel for Appellant, Mr. James H. Kreimeyer at jhkreimeyer@gmail.com and Ms. Stacey M. Soule, the State Prosecuting Attorney at information@spa.texas.gov through the Court's electronic filing system.

/s/ Charles Karakashian, Jr.

Charles Karakashian Jr.

Special Prosecutor